

LAW OFFICES OF STEPHENSON, ACQUISTO & COLMAN, INC.
JOY STEPHENSON-LAWS, ESQ. (SBN 113755)
BARRY SULLIVAN, ESQ. (SBN 136571)
RICHARD A. LOVICH, ESQ. (SBN 113472)
KARLENE J. ROGERS-ABERMAN, ESQ. (SBN 237883)
BARBARA V. LAM, ESQ. (SBN 231073)
303 N. Glenoaks Blvd., Suite 700
Burbank, CA 91502

Telephone: (818) 559-4477
Facsimile: (818) 559-5484

Attorneys for Plaintiff
LUCILE SALTER PACKARD
CHILDREN'S HOSPITAL AT STANFORD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LUCILE SALTER PACKARD
CHILDREN'S HOSPITAL AT
STANFORD, a California nonprofit
corporation,

Plaintiff,

vs.

IDAHO AGC SELF-FUNDED
BENEFIT TRUST, a voluntary
employees benefit association pursuant
to 26 U.S.C. § 501(c)(9), and DOES 1
THROUGH 25, INCLUSIVE

Defendants.

Case No.: 3:18-CV-04927-WHA

[Assigned to Hon. William Alsup]

**DECLARATION OF BARBARA V.
LAM IN SUPPORT OF
PLAINTIFF'S *OPPOSITION* TO
DEFENDANT'S MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION**

[Filed concurrently with Plaintiff's Opposition;
Declaration of Samantha Spare, and [Proposed]
Order]

DATE: November 11, 2018

TIME: 1:00 P.M.

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22738

DECLARATION OF BARBARA V. LAM

I, Barbara V. Lam, declare:

1. I am over the age of eighteen years and am not a party to this action. I am a senior attorney at the firm of Stephenson, Acquisto & Colman, Inc., attorneys of record for Plaintiff Lucile Salter Packard Children's Hospital At Stanford ("Plaintiff" or "Lucile Children's Hospital") in this matter. If called upon to testify to the facts within this declaration, I could and would competently so testify because such facts come from my own personal knowledge.

2. Before causing the complaint to be filed against Defendant Idaho AGC Self-Funded Benefit Trust ("Defendant" or "Idaho AGC") I reviewed our firm file on this matter.

3. In the file there was a letter, dated March 2, 2018, from an agent of Idaho AGC, which stated that at the time of the medical services of Patient TT, the child was covered by an Idaho AGC health plan. Furthermore, the letter stated BCBS Idaho was acting as Idaho AGC's administrator.

I declare under the penalty of perjury pursuant to the laws of the State of California and the United States that the foregoing is true and correct.

Executed on August 31, 2018, in Pleasanton, California.


BARBARA V. LAM